

1 Chaim Z. Appel, Esq. (*Admitted pro hac vice*)  
New York State Bar No. 4849444  
2 APPEL LAW FIRM PLLC  
4533-16 Avenue  
3 Brooklyn, New York 11204  
Telephone: (212) 252-2045  
4 Facsimile: (718) 972-3371  
*cappel@CustomsAndLaw.com*

5 John K. Gallagher, Esq.  
6 Nevada State Bar No. 956  
GUILD, GALLAGHER & FULLER, LTD.  
7 100 West Liberty Street, Suite 800  
Reno, Nevada 89501  
8 Telephone: (775) 786-2366  
Facsimile: (775) 322-9105  
9 *jgallagher@ggfltd.com*

10 *Attorneys for Plaintiffs*

11 UNITED STATES DISTRICT COURT

12 DISTRICT OF NEVADA

13 JOSEPH WEINFELD, LIANA KNIJNIKOVA, )  
ISAAC WEISS, ROBERT FRANK, )  
14 YEHUDAH NUSSBAUM, MOSES )  
STEINMETZ, ALBERT ISAAC, JOSEF )  
15 KOHN, MICHAEL FRIEDMAN and )  
CONGREGATION BETH JOSEPH, )  
16 Derivatively on behalf of PRECIOUS )  
MINERALS MINING AND REFINING )  
17 CORP., )

18 Plaintiffs, )

19 v. )

20 BILL L. MINOR, JOHN H. REYNOLDS, and )  
WALTER A. MARTING, JR., )

21 Defendants, )

22 and )

23 PRECIOUS MINERALS MINING AND )  
24 REFINING CORP., a Nevada corporation, )

25 Nominal Defendant. )

Case No. 3:14-cv-00513-RCJ-WGC

**STIPULATION AND ORDER TO  
EXTEND PLAINTIFFS' TIME TO FILE  
AN OPPOSITION TO DEFENDANTS'  
MOTION FOR FEES AND COSTS**

**(Second Request)**

26  
27 Plaintiffs JOSEPH WEINFELD, LIANA KNIJNIKOVA, ISAAC WEISS, ROBERT  
28 FRANK, YEHUDAH NUSSBAUM, MOSES STEINMETZ, ALBERT ISAAC, JOSEF KOHN,

1 MICHAEL FRIEDMAN and CONGREGATION BETH JOSEPH, derivatively on behalf of  
2 PRECIOUS MINERALS MINING AND REFINING CORP. (hereinafter "Plaintiffs"), and  
3 Defendants BILL L. MINOR, JOHN H. REYNOLDS, and WALTER A. MARTING, JR.  
4 (hereinafter "Defendants"), pursuant to LR IA 6-1, LR IA 6-2 and LR II 7-1, hereby stipulate and  
5 agree as follows:

6 **WHEREAS**, on March 27, 2018, this Court entered its Order and Judgment in this case for  
7 Defendants, [ECF No. 157-8], on April 10, 2018, Defendants filed Defendants' Motion for  
8 Attorneys' Fees and Costs (hereinafter "Motion"), [ECF No. 160], and on April 24, 2018, the  
9 Court entered a Stipulation and Order to Extend Plaintiffs' Time to File an Opposition to  
10 Defendants' Motion for Fees and Costs in this matter extending the deadline for Plaintiffs to file  
11 an opposition to the Motion to the current deadline of Tuesday, May 22, 2018;

12 Given that Defendants' Motion is directed at each of the remaining eight (8) individual  
13 Plaintiffs, with whom their counsel required time to meet individually to review and respond to  
14 Defendants' Motion, and that Plaintiffs' counsel had a religious obligation that prevented him  
15 from working on this matter from Friday evening, May 18, 2018, until Monday evening, May 21,  
16 2018;

17 This is the second stipulation for extension of time to file an opposition to a motion;

18 This stipulation is made by the parties in good faith and not for any improper purpose;

19 // // //

20 // // //

21 // // //

22 // // //

23 // // //

24 // // //

25 // // //

26 // // //

27 // // //

28 // // //

1       ***NOW, THEREFORE***, and good cause appearing, it is hereby stipulated and agreed as  
2 follows:

3           1.       The current deadline to oppose Defendants' Motion shall be extended for a period  
4 of one (1) week, such that the deadline for Plaintiffs to file their opposition to Defendants' Motion  
5 shall be extended to expire on Tuesday, May 29, 2018.

6           DATED the 22nd day of May, 2018.

7 LAW OFFICES OF MICHAEL J.  
8 MORRISON

APPEL LAW FIRM PLLC

9 By: /s/ Michael J. Morrison  
10 Michael J. Morrison, Esq.  
11 Nevada State Bar No. 1665  
12 1495 Ridgeview Drive, Suite 220  
13 Reno, NV 89519  
14 Tel. (775) 827-6300  
15 venturelawusa@gmail.com

*Counsel for Defendants*

By: /s/ Chaim Z. Appel  
Chaim Z. Appel, Esq. (*pro hac vice*)  
4533-16 Avenue  
Brooklyn, New York 11204  
(212) 252-2045 (phone)  
(718) 872-3371 (fax)  
cappel@customsandlaw.com

*Counsel for Plaintiffs*

16 IT IS SO ORDERED:

17   
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: May 24, 2018  
20  
21  
22  
23  
24  
25  
26  
27  
28